

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

RECEIVED

DEC 10 5 37 PM '01

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

OBJECTION OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF  
DAVID B. POPKIN – DBP/USPS-83  
(December 10, 2001)

The United States Postal Service hereby objects to interrogatory DBP/USPS-83. This interrogatory is objectionable because it is not proper follow up and the requested information is irrelevant. In addition, responding to some subparts may be unduly burdensome and may reveal commercially sensitive information.

DBP/USPS-83 provides:

Please refer to the response made to Presiding Officer's Information Request No. 5 Question No. 8 and, in particular, the response to subpart c.

- [a] Please provide a listing of the AMCs and PMPCs that are located within the state of California.
- [b] Please provide a listing for each California AMC/PMPC showing the other AMC/PMPCs that they typically forward Priority Mail to by a means other than through the FedEx Memphis Hub.
- [c] Please provide a listing of the three-digit ZIP Code prefixes that dispatch mail to and receive mail from each AMC/PMPC in California as well as those AMC/PMPCs that are not in California but appear in the response to subpart b.
- [d] Please confirm, or explain if you are not able to do so, that virtually all Priority Mail originating in Los Angeles, California and destined to points more than 1800 miles away will typically be transported through the FedEx Memphis Hub.
- [e] Please confirm, or explain if you are unable to do so, that all Priority Mail which is transported by FedEx air to and/or from the FedEx Memphis Hub will typically be transferred to or from FedEx at a USPS AMC or PMPC.

Witness Spatola responded to POIR No. 5, Question 8 with a straightforward description of how a piece of Priority Mail would be routed between five origin-destination city pairs. Mr. Popkin purportedly “follows up” on this straightforward response with a series of questions, focused primarily on details of Priority Mail dispatch and routing in the state of California, that were not even addressed in Mr. Spatola’s earlier response. This certainly would not be proper follow up to witness Spatola, and Mr. Popkin should not be able to get around this restriction by directing his interrogatory to the Postal Service.

In any event, even if the interrogatory is deemed proper follow up to the Postal Service, the requested information is still irrelevant. To what issue in this proceeding does the number of AMCs and PMPCs (assuming there even are any) located in the state of California relate?<sup>1</sup> How is it relevant to the proposed rates, fees and classifications in this case to know which AMC/PMPCs “typically” receive mail from a California AMC/PMPC without going through the FedEx Memphis hub or to know which 3-digit ZIP Codes dispatch to and receive mail from each AMC/PMPC in California, Texas and Iowa?<sup>2</sup> Why does Mr. Popkin or anyone else in this proceeding need to know what type of Postal Service facility is involved in the transfer to FedEx of Priority Mail transported by air to or from the FedEx Memphis hub? The simple answer is that none of this is relevant to this case, Mr. Popkin’s interest in the fine points of postal operations in California notwithstanding.

---

<sup>1</sup> It should be noted that the portion of witness Spatola’s response to POIR No. 5, Question 8 that discusses a California routing (subpart (c)) does not even make reference to a PMPC.

Also, as currently formulated, some of the interrogatory subparts likely would be burdensome to answer, assuming they even could be answered. For example, subpart b seems to require some sort of dispatch and routing “crosswalk” between every AMC and PMPC in the state of California and every other AMC and PMPC in every other state where Priority Mail might travel by either commercial air or surface transportation. Given differing commercial flight schedules and highway contract routes on different days of the week, this “crosswalk” could change on a daily basis. Clearly, it would be unduly burdensome to even attempt to answer this question. Also, providing such a “crosswalk” could reveal information about Priority Mail flows that would be useful to Postal Service competitors.

Likewise, subpart c appears to request a listing of all 3-digit ZIP Codes that dispatch to or receive mail from all AMCs and PMPCs in California, Texas and Iowa. “Mail” in this subpart is not even limited to Priority Mail. This could cover nearly every 3-digit ZIP Code in the country. It thus would be burdensome to respond.

If Mr. Popkin is interested in the costs or the proposed rates for Priority Mail, there is plenty of information in the case pertaining to that topic. If Mr. Popkin is interested in the costs associated with the FedEx transportation agreement, there is ample information in the case about that as well. These are the relevant topics in this proceeding. Probing every aspect of Priority Mail dispatch and routing procedures in the state of California or elsewhere is not a legitimate inquiry in this case, and the Postal Service should not have to respond.

---

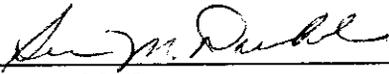
<sup>2</sup> The Postal Service has interpreted subpart (c) of Mr. Popkin’s interrogatory to be making reference to subpart (b) of Mr. Spatola’s POIR response, but it could be that it refers to subpart (b) of Mr. Popkin’s interrogatory. The question is not clear.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

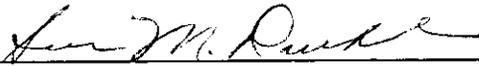
By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel, Ratemaking

  
\_\_\_\_\_  
Susan M. Duchek

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
\_\_\_\_\_  
Susan M. Duchek

475 L'Enfant Plaza West, S.W.  
Washington, D.C. 20260-1137  
(202) 268-2990; Fax -5402  
December 10, 2001